IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Document 7

| MOFET ETZION, LTD., |) |
|---|--|
| Plaintiff, |) Civil Action No. 07 CIV 4566 (LAP) |
| vs. | NOTICE OF MOTION FOR ADMISSION PRO HAC VICE OF |
| GENERAL DYNAMICS LAND SYSTEMS, INC., | RICHARD C. STIFFLER |
| Defendant. | |

PLEASE TAKE NOTICE, that upon the declaration of Chinh Q. Le, Esq., Defendant General Dynamics Land Systems, Inc., by its attorneys Jenner & Block LLP, respectfully moves the Court, pursuant to Local Rule 1.3(c), for an Order allowing the admission pro hac vice of Richard C. Stiffler, Esq., Jenner & Block LLP, 330 N. Wabash Avenue, Chicago, IL 60611-7603, (312) 840-8640, (312) 840-8740 (facsimile), for the pendency of the above-captioned case or further order of this Court. There are no pending disciplinary proceedings against Richard C. Stiffler in any State or Federal court. A proposed order is submitted with this motion.

Dated: June 5, 2007

Respectfully,

JENNER & BLOCK LLP

By:

Chinh Q. Le (CL-9036)

919 Third Avenue

37th Floor

New York, New York 10022

(212) 891-1600

(212) 891-1699

Attorneys for Defendant

CERTIFICATE OF SERVICE

I, Chinh Le, an attorney, hereby certify that on June 5, 2007 I caused true and correct copies of the foregoing *Motion for Admission Pro Hac Vice* and supporting documents to be served on the following individuals via USPS first class mail:

Jeffrey Bialos

Sutherland Asbill & Brennan LLP 1275 Pennsylvania Avenue NW Washington, DC 20004 (202)383-0100

Fax: (202)383-3593

John L. North

Sutherland Asbill & Brennan LLP 1275 Pennsylvania Avenue, NW Washington, DC 20004 (202)383-0100

Fax: (202)383-3593

Lawrence Andrew Dany, III

Sutherland Asbil & Brennan, LLP (NYC) 1114 Avenue of the Americas 40th Flr.
New York, NY 10036 (212)-389-5000

Fax: (212)-389-5099

Attorneys for Plaintiff.

Chin Q. Le (¢L-9036)

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| MOFET ETZION, LTD., |) | |
|-----------------------|---|------------------------------------|
| |) | Civil Action No. 07 CIV 4566 (LAP) |
| Plaintiff, |) | |
| |) | DECLARATION OF CHINH Q. LE IN |
| VS. |) | SUPPORT OF MOTION FOR |
| |) | ADMISSION PRO HAC VICE OF |
| GENERAL DYNAMICS LAND |) | RICHARD C. STIFFLER |
| SYSTEMS, INC., |) | |
| |) | |
| Defendant. |) | |
| |) | |

I, CHINH Q. LE, declare as follows:

- 1. I am a member in good standing of the bar of this Court.
- 2. This declaration is made in support of Defendant General Dynamics Land Systems, Inc.'s motion seeking admission *pro hac vice* of Richard C. Stiffler pursuant to Local Rule 1.3(c) of the United States District Court for the Southern District of New York.
- 3. Richard C. Stiffler is a partner in the firm of Jenner & Block LLP, 330 N. Wabash Ave., Chicago, Illinois, 60611 and has been practicing law since 1999. He is a member in good standing with the bar of the State of Illinois. *See* Certificate of Good Standing attached as Exhibit A to the Declaration of Richard C. Stiffler in Support of Motion for Admission *Pro Hac Vice*.
- 4. He has advised me that he is familiar with the Federal Rules of Civil Procedure and with the Local Rules of this Court.
- 5. There are no disciplinary proceedings currently pending against Mr. Stiffler in any state or federal court.
- 6. I believe Mr. Stiffler will conduct himself in the manner required of attorneys that practice in, and are admitted to, this Court, and therefore I respectfully request that he be

admitted pro hac vice for the purpose of representing General Dynamics Land Systems, Inc. during the pendency of this action or on further order of this Court.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 5, 2007

-2-

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| MOFET ETZION, LTD., |) |
|---|--|
| Plaintiff, |) Civil Action No. 07 CIV 4566 (LAP) |
| vs. | DECLARATION OF RICHARD C. STIFFLER IN SUPPORT OF MOTION FOR ADMISSION PRO HAC VICE |
| GENERAL DYNAMICS LAND SYSTEMS, INC., | |
| Defendant. |))) |

I, RICHARD C. STIFFLER, declare as follows:

- 1. I am a resident of Illinois and have been a practicing attorney in the State of Illinois since 1999. I am a partner with the law firm of Jenner & Block LLP, which maintains an office at 330 N. Wabash Avenue, Chicago, Illinois, 60611.
- 2. I make this declaration in support of my application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York to serve as counsel for Defendant, General Dynamics Land Systems, Inc. ("GDLS"), in the above-captioned matter. My admission *pro hac vice* will serve GDLS' interests, and will facilitate the efficient litigation of this matter, given my firm's representation of GDLS on this matter to date.
- 3. I was admitted to practice before the courts in the following jurisdictions on the dates set forth below:
 - a. State of Illinois Supreme Court (1999);
 - b. U.S. District Court for the Northern District of Illinois (1999);
 - c. U.S. Court of Appeals for the Sixth Circuit (2001).

4. I am a member in good standing of the foregoing bars, and I have never been disbarred or suspended. Moreover, there are no disciplinary proceedings pending against me. A true and correct copy of my Certificate of Good Standing issued by the Supreme Court of Illinois is attached at Exhibit A.

I declare under penalty of perjury that the foregoing is true and correct.

Executed: June 4, 2007

Richard C. Stiffler

Certificate of Admission To the Bar of Illinois

I, Juleann Hornyak, Clerk of the Supreme Court of Illinois, do hereby certify that

Richard Clayton Stiffler

has been duly licensed and admitted to practice as an Attorney and Counselor of Law within this State; has duly taken the required oath to support the CONSTITUTION OF THE UNITED STATES and of the STATE OF ILLINOIS, and also the oath of office prescribed by law, that said name was entered upon the Roll of Attorneys and Counselors in my office on November 4, 1999 and is in good standing, so far as the records of this office disclose.

In Witness Whereof, I have hereunto placed my hand and affixed the seal of said Supreme Court, at Springfield, in said State, this Friday, June 01, 2007.

Juleanni Hornyak

Clerk

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

| Defendant. The motion for admission of Counsel pro hac vice in this matter having come before and been considered by the Court, and the Court being satisfied that Richard C. Stiffler, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission Pro Hac Vice of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court pro hac vice as counsel for Defendant. | MOFET ETZION, LTD., |) |
|---|---|--|
| ADMISSION PRO HAC VICE GENERAL DYNAMICS LAND SYSTEMS, INC., Defendant. Defendant. The motion for admission of Counsel pro hac vice in this matter having come before and been considered by the Court, and the Court being satisfied that Richard C. Stiffler, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission Pro Hac Vice of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court pro hac vice as counsel for Defendant. | Plaintiff, | Civil Action No. 07 CIV 4566 (LAP) |
| GENERAL DYNAMICS LAND SYSTEMS, INC., Defendant. Defendant. The motion for admission of Counsel pro hac vice in this matter having come before and been considered by the Court, and the Court being satisfied that Richard C. Stiffler, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission Pro Hac Vice of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court pro hac vice as counsel for Defendant. | VS. | · · · · · · · · · · · · · · · · · · · |
| The motion for admission of Counsel <i>pro hac vice</i> in this matter having come before and been considered by the Court, and the Court being satisfied that Richard C. Stiffler, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission <i>Pro Hac Vice</i> of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | GENERAL DYNAMICS LAND SYSTEMS, INC., |)) |
| been considered by the Court, and the Court being satisfied that Richard C. Stiffler, Esq., is licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission <i>Pro Hac Vice</i> of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | Defendant. |))) |
| licensed and admitted to practice law and a member in good standing of the Bar of the State of Illinois, it is hereby ORDERED that the Motion for Admission <i>Pro Hac Vice</i> of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | The motion for admission of Counsel | I pro hac vice in this matter having come before and |
| ORDERED that the Motion for Admission <i>Pro Hac Vice</i> of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | been considered by the Court, and the Court | being satisfied that Richard C. Stiffler, Esq., is |
| ORDERED that the Motion for Admission <i>Pro Hac Vice</i> of Richard C. Stiffler, Esq., is GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | licensed and admitted to practice law and a r | member in good standing of the Bar of the State of |
| GRANTED and Richard C. Stiffler is admitted to the Bar of this Court <i>pro hac vice</i> as counsel for Defendant. | Illinois, it is hereby | |
| for Defendant. | ORDERED that the Motion for Adm | ission Pro Hac Vice of Richard C. Stiffler, Esq., is |
| | GRANTED and Richard C. Stiffler is admitt | ted to the Bar of this Court pro hac vice as counsel |
| Dated: | for Defendant. | |
| | Dated: | - |
| UNITED STATES DISTRICT JUDGE | | INITED STATES DISTRICT HIDGE |